

THE LAW OFFICES OF MEHDI ESSMI

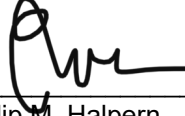
April 12, 2023

The Honorable Judge Philip M. Halpern
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

There being no objection from Probation or the Government, the application to remove Defendant's monitoring conditions is hereby granted.

The Clerk of Court is respectfully requested to terminate the motion sequence pending at Doc. 52.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 24, 2023

Re: **United States of America v. Quinlan Daniel O'Brien (7:21-cr-00597-PMH-1)**

Via Electronic Case Filing (ECF)

Dear Judge Halpern,

As Counsel for the defendant, Quinlan Daniel O'Brien, I am seeking an order granting permission for Probation to lift the location monitoring conditions for Mr. O'Brien. Since the time of Mr. O'Brien's sentencing, he has done well on supervised release and home confinement. At this time, Probation Officer Jason Lerman informs me that Mr. O'Brien is compliant with supervised release, maintains gainful employment, and continues his education. Accordingly, Mr. Lerman has advised Counsel that Mr. O'Brien's location monitoring conditions should be removed and that all other conditions of Mr. O'Brien's Supervised release should stay the same.

At the time of Mr. O'Brien's sentencing, he was employed by Handyboys LLC, taking CPR/First Aid training classes, and studying philosophy. Since his sentencing Mr. O'Brien began school at SUNY New Paltz and is on track to declare a double major in management and philosophy. He changed employment to become a Sales Associate at Best Buy and he is on track to receive a promotion to the full-time position of Microsoft Specialist in the coming month. He is making all fine payments on time. Mr. O'Brien has acted in accordance with the advice that your Honor gave him at his sentencing hearing.

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Accordingly, Officer Lerman and the Defense are seeking a modification of Mr. Obrien's Supervised Release conditions that will grant probation permission to remove Mr. O'Brien's location monitoring conditions. We have spoken with AUSA Steven Kochevar and the Government objects to this request.

Thank you for your attention to this matter.

Respectfully,

Mehdi Essmidi

Mehdi Essmidi

cc: AUSA Steven Kochevar
US Probation Officer Jason Lerman

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